

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY,
et al.,

Debtors.

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Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

SUPPLEMENTAL DECLARATION OF RICHARD K. MILIN

RICHARD K. MILIN hereby declares as follows:

1. I am a member of the Bar of the State of New York and of counsel to the firm of Togut, Segal & Segal LLP, conflicts counsel to the Motors Liquidation Company GUC Trust (the “**GUC Trust**”), formed by Motors Liquidation Company and its affiliated above-captioned debtors. I respectfully submit this Declaration based upon personal knowledge and my review of the files in support of the GUC Trust’s (I) Reply in Support of its Objection to Proof of Claim Number 71242 Asserted by Chartis Specialty Insurance Company on the Ground that the Claim Is Not Properly Secured by a Valid Right of Setoff and (II) Response in Opposition to Cross-Motion To Compel Arbitration.

2. I attach as Exhibit 1 a copy of a Storage Tank Third-Party Liability, Corrective Action and Clean-Up Costs Policy stated to be effective April 1, 2010, entered into by and between Chartis Specialty Insurance Company and Motors Liquidation Company. This policy bears Renewal Number 0907326, which is referred to in the Schedule of Policies and Payments in the Payment Agreement between American International Specialty Lines Insurance Company and General Motors Corporation dated September 1, 2006 (the “**AISLIC Payment Agreement**”). The AISLIC Payment Agreement is attached to the Declaration of Bryan D. Leinbach in Support of

Opposition of Chartis Specialty Insurance Company and Lexington Insurance Company to the Reorganized Debtor's Supplemental Amended Claims Objection to Proof of Claim Number 71242 and Cross-Motion to Compel Arbitration (the "Leinbach Declaration") as Exhibit A.

3. I attach as Exhibit 2 a copy of a Hazardous Waste – Corrective Action Policy stated to be effective April 1, 2009, entered into by and between American International Specialty Lines Insurance Company and General Motors Corporation. This bears Policy Number 0907329, which is referred to in the Schedule of Policies and Payments in the AISLIC Payment Agreement.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in New York, New York on December 22, 2011

/s/ Richard K. Milin
RICHARD K. MILIN